

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**CIVIL ACTION NO.:** 2:25-cv-00252

**THE CONTENTS OF CRYPTOCURRENCY WALLET  
ADDRESS TGHwHMFfvKiJ9qULiKTwL47RCSeFXFWzQa,**

**Defendant.**

**VERIFIED COMPLAINT OF FORFEITURE**

Comes now, the United States of America (“Plaintiff”), by and through its attorneys, Lisa G. Johnston, Acting United States Attorney for the Southern District of West Virginia, and Justin A. Marlowe, Assistant United States Attorney for the Southern District of West Virginia, and respectfully brings this Verified Complaint of Forfeiture in rem (the “Complaint”) and alleges as follows in accordance with Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and to the extent applicable 18 U.S.C. §§ 981, 983, 984, and 985, and the Federal Rules of Civil Procedure.

**NATURE OF ACTION**

1. This is a civil action in rem brought on behalf of the United States of America, pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (a)(1)(C) and Rule G(2), to enforce the provisions for the forfeiture of defendant properties, constituting proceeds of, or which was used or intended to be used in any manner or part to commit or to facilitate the commission of one or more violations of 18 U.S.C. §§ 1343.

**THE DEFENDANT IN REM**

2. Plaintiff, United States of America, alleges the following upon information and belief for its claim against the above-named defendant(s): The contents of deposit address TGHwHMFfvKiJ9qULiKTwL47RCSeFXFWzQa, located with Paxful, Inc., fiat value \$32,418.

**JURISDICTION AND VENUE**

3. Plaintiff brings this action in rem in its own right to forfeit and condemn the defendant property. This Court has jurisdiction over an action commenced by the United States under Title 28 United States Code, Section 1345, and over an action for forfeiture under Title 28, United States Code, Section 1355(a).

4. Venue is proper in this district pursuant to 28 U.S.C. §§ 1355(b)(1) and 1395, because the acts or omission giving rise to the forfeiture occurred in this district.

**BASIS FOR FORFEITURE**

5. The United States alleges that the Defendant Cryptocurrencies involved in a transactions or attempted transactions in violation of 18 U.S.C. §§ 1956 and 1957, and which constitute or were derived from proceeds traceable to violations of 18 U.S.C. § 1343. The Defendant Cryptocurrencies are, therefore, subject to forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and 981(a)(1)(C).

6. An individual who is a victim “Victim” and who resides in Cabell County, which is located within the Southern District of West Virginia, was alerted by his work-computer that it had a potential malware/spyware compromise. The computer alert notified the Victim to contact support and provided a telephone number. The Victim was told that their personal information and bank accounts might also be compromised. The support employee then asked the Victim what bank they

utilized, to which the Victim replied, JP Morgan Chase Bank, N.A. (Chase). The support employee then proceeded to connect the Victim to a “Chase Fraud Investigator”.

7. The Chase Fraud Investigator then informed the Victim that \$22,500 had been paid out of their account to purchase child pornography. The Victim was also told by this Chase Fraud Investigator that there were records showing that the Victim had made a personal verification to send the money for the child pornography.

8. The Chase Fraud Investigator also told the Victim that the US Federal Government would charge the Victim with felony child pornography charges, that there were 27 foreign agents that hacked into his computer, and that the Victim had to filter his money through the Federal Reserve, so that the “bad guys” couldn’t get it.

9. The Victim was also warned by the Chase Fraud Investigator that there were 40 to 50 people at Chase Bank who were being investigated, so he could not tell anyone at the bank what was happening, out of fears that the Chase Bank employees themselves were “compromised”.

10. On or about September 12, 2024, the Victim was instructed by the Chase Fraud Investigator to withdraw a total of \$42,500 from his Chase Bank accounts in \$100 bills.

11. The Victim withdrew a total of \$42,500 of funds from the Victim’s accounts at Chase Bank.

12. The Victim was then instructed by the Chase Fraud Investigator to take the money that was withdrawn from JP Morgan Chase Bank to The Workingman’s Family Store located at 140 Fifth Avenue, Huntington, West Virginia and to deposit the cash into the Bitstop cryptocurrency machine in the back of the store.

13. The Victim deposited a total of \$42,500 via three transactions into the Bitstop cryptocurrency machine located at 140 Fifth Avenue, Huntington, West Virginia. The Victim purchased Bitcoin (BTC), and the Bitcoin was sent to BTC deposit address

bc1qgfzmg56gtupdzazj5cvrt8c40z0r8wy7nzd6yd (hereinafter, this deposit address is referred to as the “Target Wallet Two”).

14. On or about September 13, 2024, Special Agent Benjamin Ouellette made contact with Margo Network, the company who controls the network where the Bitcoin ATM that the Victim lost funds through operates. On or about September 13, 2024, Margo Network employees were able to trace the movement of the transaction hashes made by the Victim. These three transactions made by the Victim total approximately 0.54 Bitcoin. Per tracing efforts, the three transactions above result in the 0.54 BTC being sent to Target Wallet Two, followed by the 0.54 BTC being sent to wallet deposit address: 3NclgCGF3t8sjz8jA9rShDED24SHjNwoK8 (hereinafter, this deposit address is referred to as the “Target Wallet One”). Ultimately, Target Wallet One is located with an exchange service called Paxful, Inc. On or about February 13, 2025, Paxful, Inc. provided records to Special Agent Benjamin Ouellette, which identified Target Wallet One as being controlled by a Paxful, Inc. account with the username Anusharma324236 (hereinafter, this Paxful account is referred to as “Target Account One”). According to records, Target Account One is owned by an individual by the name of SONU, with a location provided of India.

15. Per Paxful, Inc. records, Target Wallet One (controlled as part of Target Account One) received 0.54 BTC on September 13, 2024 (as part of transaction hash 788c53fdbf7a767c1ce3092b0e785d64d24a05e397a9de7378434f136ded7b1c). These funds were then converted to Tether (USDT) on the same date, with the USDT ultimately ending up in USDT wallet address TGHwHMFfvKiJ9qULiKTWl47RCSeFXFWzQa (hereinafter, this wallet address is referred to as “Target Wallet Three”). Target Account One was shown in records to control Target Wallet Three, which has a balance of 32418.14718 USDT.

16. Special Agent Benjamin Ouellette was able to verify Margo Network's tracing efforts of the Victim's funds through independent tracing efforts.

17. Tether, is a "stablecoin" that is issued by a company called Tether Limited, Inc.

18. Stablecoins are a type of virtual currency whose value is pegged to a commodity's price, such as gold, or to a fiat currency, such as the U.S. dollar, or to a different virtual currency. For example, USDC is a stablecoin pegged to the U.S. dollar. Stablecoins achieve their price stability via collateralization (backing) or through algorithmic mechanisms of buying and selling the reference asset or its derivatives. The Tether stablecoin was initially designed to always be worth one U.S. dollar.

19. A freeze letter is currently in place for Target Account One with Paxful, Inc, to include Target Wallet Three.

#### **CLAIM FOR RELIEF**

WHEREFORE, the United States prays that the Defendant Cryptocurrencies be forfeited to the United States of America, that the Plaintiff be awarded its costs and disbursements in this action, and for such other and further relief as the Court deems proper and just.

Respectfully submitted,

LISA G. JOHNSTON  
Acting United States Attorney

By: /s/Justin A. Marlowe  
JUSTIN A. MARLOWE  
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VERIFICATION

STATE OF WEST VIRGINIA  
COUNTY OF KANAWHA, TO-WIT:

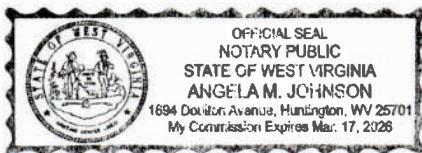
I, Special Agent, Benjamin Ouellette, an agent with the United States Federal Bureau of Investigation, hereby verify and declare under penalty of perjury as provided by 28 U.S.C. § 1746, the following:

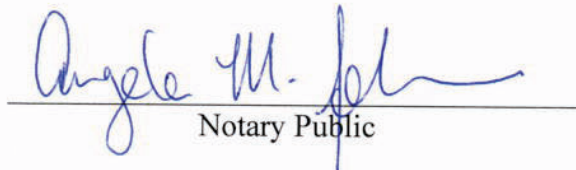
That the foregoing Verified Complaint for Forfeiture in rem is based upon reports and information I personally have prepared or gathered and which have been provided to me by various law enforcement personnel, and that everything contained therein is true and correct to the best of my knowledge and belief, except where stated to be upon information and belief, in which case I believe it to be true.

Executed on April 17, 2025.

  
BENJAMIN OUELLETTE

Taken, subscribed and sworn to before me this 17 day of April 2025.



  
Notary Public

My commission expires on March 17, 2026.